

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Case No. 21-21177-GLT
)	
LaVonne Clanagan)	Chapter 13
Debtor)	
)	Doc. No.:
)	
LaVonne Clanagan)	
Movant)	
)	
v.)	
)	
HSBC Bank USA, N.A. and)	
Ronda J. Winnecour, Trustee)	
Respondent)	

DECLARATION

I, Albert G. Reese Jr., Esquire, attorney for the above-referenced Debtor, hereby submit this formal written Declaration that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt for the following reason:

Pursuant to HSBC Bank USA, N.A.'s Notice of Mortgage Payment Change dated May 8, 2025, the Debtor's current escrow payment for account number ending in **0689** is **\$301.50**. The new escrow payment is **\$402.05**. The new total mortgage payment is **\$839.05** effective June 1, 2025. The Debtor will make the escrow shortage in addition to her regular monthly Chapter 13 plan payment.

Dated: **May 15, 2025**

Respectfully submitted by:
/s/ LaVonne Clanagan
LaVonne Clanagan

Dated: **May 15, 2025**

Respectfully submitted by:
/s/ Albert G. Reese, Jr., Esquire
Albert G. Reese, Jr., Esquire
Attorney for Debtor
PA ID #93813
640 Rodi Road, 2nd Floor, Suite 2
Pittsburgh, PA 15235
(412) 241-1697
(412) 241-1687(fax)
areese8897@aol.com